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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Michael A. Hammer  
 :  
 Julien Giraud III : Mag. No. 21-10433  
 and :  
 Julien Giraud Jr. :

I, Ramon Perez, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Bureau of Alcohol Tobacco Firearms and Explosives and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

  
\_\_\_\_\_  
Ramon Perez, Special Agent  
Bureau of Alcohol Tobacco Firearms and Explosives

Sworn to and subscribed via telephone  
December 7, 2021, New Jersey  
Authorized telephonically pursuant to Fed. R. Crim. P. Rule 4.1

Hon. Michael A. Hammer  
United States Magistrate Judge

s/ The Honorable Michael A. Hammer  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Possession with Intent to Distribute Marijuana and Alprazolam)

On or about December 1, 2021, in Union County, in the District of New Jersey and elsewhere, the defendant,

**JULIEN GIRAUD III,**

knowingly and intentionally did possess with the intent to distribute a quantity of a substance containing a detectable amount of marijuana a Schedule I controlled substance and a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance..

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D), and (b)(2).

**COUNT TWO**

(Possession with Intent to Distribute Marijuana)

On or about December 1, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JULIEN GIRAUD III,**

knowingly and intentionally did possess with the intent to distribute a quantity of a substance containing a detectable amount of marijuana.

In violation of Title 21, United States Code, Section 841(a)(1) (b)(1)(D).

**COUNT THREE**

(Possession of a Firearm During and In Relation to a Drug Trafficking Crime)

On or about December 1, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JULIEN GIRAUD III,**

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, the possession with intent to distribute marijuana, as charged in Count Two of this Criminal Complaint, did knowingly possess, use, and carry a firearm, namely a Windham Weaponry, Model WW-15, 5.56 caliber semi-automatic firearm bearing serial number WW022912.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT FOUR**

(Possession with Intent to Distribute Cocaine and Heroin)

On or about December 1, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JULIEN GIRAUD JR.,**

did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance .

In violation of Title 21, United States Code, Section 841(a)(1) (b)(1)(B) and (b)(1)(C).

**COUNT FIVE**

(Possession of a Firearm During and In Relation to a Drug Trafficking Crime)

On or about December 1, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JULIEN GIRAUD JR.,**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, the possession with intent to distribute heroin and cocaine charged in Count Four of this Criminal Complaint, did knowingly possess a firearm, namely a silver Taurus Brazil .357 magnum revolver, bearing serial number NB907021.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**ATTACHMENT B**

I, Ramon Perez, am a Special Agent with the Bureau of Alcohol Tobacco Firearms and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about December 1, 2021, an undercover Elizabeth Police Officer (the "UC") contacted Julien Giraud III ("GIRAUD III") to arrange for the purchase of a quantity of marijuana and alprazolam pills. GIRAUD III and the UC agreed to meet in the area of Spring Street in Elizabeth ("LOCATION-1") to conduct the narcotics transaction.

2. GIRAUD III arrived at LOCATION-1 as the back seat passenger in a ride share vehicle ("VEHICLE -1"). GIRAUD III exited the back seat of VEHICLE-1 carrying a tan paper shopping bag. UC-1 then exited his/her vehicle and met with GIRAUD III. The UC then identified him/herself as a police officer and attempted to grab hold of the paper bag as backup Elizabeth officers (the "OFFICERS") approached. GIRAUD III discarded the tan paper bag and attempted to flee, but was apprehended by the OFFICERS.

3. The tan paper bag was recovered and found to contain a large ziplock style bag containing a green vegetative substance, suspected marijuana, and twenty (20) oval pills marked G3719, identified as alprazolam pills. GIRAUD III's New Jersey driver's license was recovered which identified his address as 30 Elm Place, Irvington, New Jersey.

4. The OFFICERS then conducted a lawful search of GIRAUD III's residence at 30 Elm Place in Irvington (the "RESIDENCE").

5. In the attic bedroom of the RESIDENCE, the OFFICERS recovered documents belonging to GIRAUD III, one-hundred-sixteen bags of marijuana, and a Windham Weaponry Model WW-15 5.56 caliber semi-automatic firearm bearing serial number WW022912 and a thirty-round magazine containing nine (9) 5.56 rounds of ammunition.

6. In another bedroom of the RESIDENCE, the OFFICERS recovered, in addition to other items, the New Jersey driver's license and United States passport of Julien Giraud, Jr. ("GIRAUD JR"), a kilogram of suspected cocaine in brick form, and additional suspected cocaine packaged in bags, knotted baggies, and paper folds. The suspected cocaine was field tested and returned a

positive result for cocaine. From a black toolbox in GIRAUD JR's bedroom, the OFFICERS recovered 4,345 glassine envelopes of suspected heroin with various stamps and a silver Taurus Brazil .357 magnum revolver bearing serial number NB907021 loaded with six (6) rounds of ammunition. Additionally, five (5) various sized bags of marijuana, twelve (12) THC cartridges, packaging materials, controlled substances ledgers and correspondence, and \$18,054 in US currency were recovered from GIRAUD JR.'s bedroom.

7. Prior to the lawful search of the RESIDENCE, the OFFICERS conducted surveillance on the RESIDENCE. In the course of the surveillance, the OFFICERS observed GIRAUD JR. arrive at the RESIDENCE in a 2007 Dodge minivan registered to his name. GIRAUD JR entered the residence, but exited and left in the minivan before the search commenced.